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2009 MAY -6 PM 2:58

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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5-14-2009

BY WJ DEPUTY

(WJ)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

June 2008 Grand Jury

| | | | |
|----|---------------------------|---|------------------------------------|
| 11 | UNITED STATES OF AMERICA, |) | Case No. <u>09CR0577-MMA</u> |
| 12 | |) | |
| 12 | Plaintiff, |) | <u>I N D I C T M E N T</u> |
| 13 | |) | (Superseding) |
| 13 | v. |) | |
| 14 | JESUS NAVARRO-MONTES, |) | Title 21, U.S.C., Secs. 841(a)(1) |
| 15 | |) | and 846 - Conspiracy to Distribute |
| 15 | Defendant. |) | Marijuana; Title 21, U.S.C., |
| 16 | |) | Sec. 841(a)(1) - Possession of |
| 16 | |) | Marijuana with Intent to |
| 17 | |) | Distribute; Title 18, U.S.C., |
| 17 | |) | Secs. 7(3) and 1111 - Second |
| | |) | Degree Murder |

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including January 19, 2008, within the Southern District of California and elsewhere, defendant JESUS NAVARRO-MONTES did knowingly and intentionally conspire with other persons known and unknown to the grand jury to distribute 100 kilograms and more of marijuana, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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WJ

Count 2

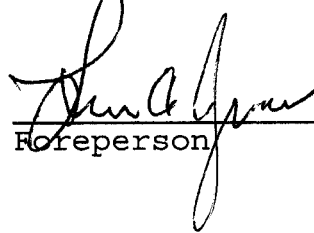
On or about September 23, 2007, within the Southern District of California, defendant JESUS NAVARRO-MONTES did knowingly and intentionally possess, with intent to distribute, approximately 445.32 kilograms (979.70 pounds) of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

Count 3

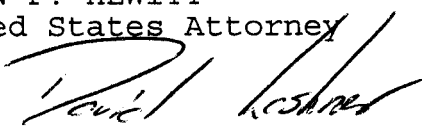
On or about January 19, 2008, within the Southern District of California, in the Imperial Sand Dunes Recreation Area, defendant JESUS NAVARRO-MONTES with malice aforethought did unlawfully kill Border Patrol Agent L. Aguilar by striking Agent L. Aguilar with a Hummer vehicle; in violation of Title 18, United States Code, Sections 7(3) and 1111.

DATED: May 6, 2009.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By: 
DAVID D. LESHNER
Assistant U.S. Attorney